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State of Washington  
**DEPARTMENT OF FISH AND WILDLIFE**  
District 4 Office: 2620 North Commercial Avenue - Pasco, Washington 99301 - (509) 545-2014

May 8, 2002

Bonneville Power Administration  
Attention: Stacy Mason  
P. O. Box 3621-KEC  
Portland, Oregon 97208-3621

Dear Ms Mason:

**SUBJECT: NEPA -Draft Environmental Impact Statement - McNary - John Day Transmission Line Project; Bonneville Power Administration, Construct transmission line and associated access roads and water crossing structures, Benton, and Klickitat Counties, Washington.**

The Washington Department of Fish and Wildlife (WDFW) has reviewed the above-referenced National Environmental Policy Act (NEPA) document and offers the following comments at this time. Other comments may be offered as the project progresses.

**Fish Resource Impacts**

The Draft Environmental Impact Statement indicates that there will be several stream crossings associated with both the new and the improved access roads proposed throughout the project. Hydraulic Project Approvals will be required for installation and maintenance of all proposed water crossing structures. There is insufficient information in the DEIS to determine if additional mitigation will be necessary for these projects, especially with regard to the 11 fish bearing streams which will be crossed by access roads.

We concur with the recommended mitigation measures within the DEIS that all towers are placed at least 200 feet from the ordinary high water line of fish bearing streams. We also support the use of existing water crossing structures whenever possible to avoid the need for new structures. The recommended application of BMPs within the DEIS for road construction and maintenance should be implemented to avoid sedimentation of fish bearing waters.

**Permitting**

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It appears from the general description of the project, that a Hydraulic Project Approval (HPA; Chapter 77.55 RCW, WAC 220-110) to be issued by WDFW, will be required for the project.

There is, however, insufficient project detail to determine specific conditions or mitigation to be placed on the project at this stage of the project development. We encourage you to seek involvement from WDFW on resource needs and typical project requirements to insure proper protection of fish life as you proceed with project design and development. Early involvement with WDFW will facilitate later processing of the HPA. Once final design plans are available, please submit a completed Joint Aquatic Resource Permits Application (JARPA) for an HPA, including complete plans and specifications, to WDFW for review.

The plans and specifications should be developed relative to the ordinary high water line. The drawings should accurately depict existing conditions including all prominent natural features and manmade improvements in the water and on the bank in the immediate vicinity of the project area. They should include plan and cross-sectional views of the proposed project, a vicinity map of the project area, and accurate directions to the project site. In addition, to aid us in locating the project site, a photograph should be supplied.

## **Wetland Impacts**

Although the DEIS identifies wetlands within the project route, there appears to be insufficient information to determine to what extent they will be affected by the project. The proposed access roads and other associated structures should be located to avoid impacts to these wetlands. In instances where structures must be placed within or near wetlands, delineations should be completed to determine mitigation requirements.

## **Unmitigated Impacts**

While the DEIS identifies the Environmental Consequences and provides means to avoid most of the potential environmental risks associated with the proposed project, it also itemizes impacts which cannot be avoided. We believe that the project will contribute to an increased level of habitat fragmentation and a reduction in available shrub-steppe vegetation for wildlife habitat.

Unmitigated impacts include the area of habitat which will be lost through construction of roads, improved roads, pulling and reeling, staging areas, substations, wetlands, water crossing structures, riparian corridors, and well as other cumulative impacts. While it is relatively easy to total the acreage of impacted habitats, cumulative impacts and disturbance associated with the projects are more difficult to assess.

Section S-2 of the DEIS indicates that the road disturbance associated with the preferred alternative will result in 15.8 miles of new road or more than 76 acres (15.8 miles x 5,280 ft/mile x 40 foot average road width) of habitat disturbance. It is not clear in the DEIS about the amount of additional vegetation or shrub-steppe impacts associated with improving and widening 40 miles of existing roads. Section S-2 also indicates that the tower pads will result in the loss of 90.0 acres (360 towers x 0.25 acre disturbance), and an additional 1.3 acres will be lost to substation installation. These figures add up to more than 167 acres of habitat that would be lost through implementation of the preferred alternative, not including impacts associated with wetlands, equipment staging areas, and conductor tensioning sites. The shrub steppe component of the lost habitat appears to be 51 acres (68 acres of vegetation - 17 acres of agricultural land) that will be permanently disturbed.

It appears that the total direct loss of shrub-steppe habitat will be between 50 and 100 acres. Direct loss may be reduced if restoration and revegetation work is implemented in the project corridor. Additional impacts to fish and wildlife which are likely to result from implementation of the preferred alternative includes, the lineal distribution of noxious weeds, bird strikes, some loss of ecological connectivity due to habitat fragmentation.

WDFW's mitigation policy is to seek greater than 1:1 mitigation ratios for impacts or direct loss of fish and wildlife habitat. Three to one (3:1) ratios are typically used. A 3:1 to 5:1 mitigation ratio is valid for shrub-steppe due to: 1) difficulty in restoring habitats in arid environments; 2) length of time to restore a climax community (20-30+ years for sagebrush); 3) fragmentation impacts beyond those of direct habitat lost by roads, towers etc. (e.g., transmission line built through a remnant block of shrub-steppe reduces the ecological connectivity and functionality of the whole block even though most habitat is not directly disturbed).

With consideration of expected cumulative impacts it appears that the preferred alternative will conservatively require acquisition or protection of a minimum of 150 to 300 acres of shrub-steppe habitat to mitigate for impacts which cannot be avoided.

It is difficult to evaluate impacts and develop suitable mitigation through a piecemeal approach whereby each project is considered individually and not in context with all BPA's proposals in south central and south eastern Washington. Independent biological assessments of the environmental impacts of multiple projects in shrub-steppe habitat often does not fully assess the combined cumulative effects on the landscape.

It is assumed that the other proposed projects associated with wind power, transmission lines, substations, and gas turbine power plants identified in the DEIS, will also require some

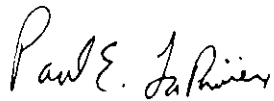
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mitigation. We strongly advocate the development of a comprehensive mitigation banking plan which consolidates necessary mitigation for all proposed projects. Scientific literature indicates that shrub-steppe habitat owes a great deal of its functionality to large, contiguous blocks, and mitigation banking is a valid means of mitigating for loss of shrub-steppe vegetation. Mitigation from each proposed project could be banked to secure large blocks of relatively intact shrub-steppe habitat. The mitigation banking effort could be coordinated through BPA's existing Fish and Wildlife programs.

Thank you for the opportunity to provide these comments. We look forward to meeting with you regarding mitigation opportunities and development of a comprehensive mitigation plan. If you have any questions, please contact me at (509) 545-2014.

Sincerely,



Paul E. LaRiviere  
Area Habitat Biologist  
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cc: SEPA Coordinator, WDFW  
Clausing, WDFW, Region 3  
Larsen, WDFW, Pasco  
Teske, WDFW, Ellensburg